## Message

Pratt, Marirose [Pratt.Marirose@epa.gov] From:

2/18/2022 4:14:43 PM Sent:

To: Weber, Steven D. [steveweber@parkerpoe.com]

CC: Cobery, Jim [JimC@TheKraftGroup.com]; Stephanie Blackman [sblackman@schwarzpartners.com] Subject: RE: Status Update - New-Indy Catawba LLC's Response to EPA Section 114 Information Request

Hi Steve

Thank you for the status update on New Indy's response to EPA's most recent CAA Section 114 request.

My program clients have a few follow up questions regarding the update.

- 1. You state that the date, time, and duration of when the stripper off gases are vented to the atmosphere and not sent to the corresponding air pollution control device is not data that is measured. Can you please explain how New Indy complies with the requirements for the steam stripper bypass in 40 CFR §§ 63.443, 63.450(d), and CFR 63.454 if New Indy does not collect or maintain records of this data?
- 2. Please elaborate on why monthly records of SO2 emissions are not available. (It is the EPA's understanding that the company maintains records of SO2 captured by wood ash (daily records) and annual SO2 emissions (monthly records and 12-month rolling sum records). Combination boiler #1 and combination boiler #2 are emission units that are part of the monthly SO2 emission calculations).
- 3. Please explain how monthly SO2 emissions from combination boiler #1 and combination boiler #2 are calculated without knowing the amount of SOGs and NCGs incinerated in the boilers.
- 4. Please elaborate on why monthly bleach and unbleached production data is not available prior to January 2007.
- 5. Please elaborate on why annual pulping system closed collection system method 21 evaluations, monthly condensate closed collection system inspections, and annual condensate closed collection system method 21 evaluations are not available prior to 2014.

Your status update did not indicate that New Indy would need additional time to respond to the 114 request. Can you please confirm that New Indy is planning to submit a complete response to the 114 request by the original deadline or do you anticipate requesting an extension?

Regards, Marirose

Marirose J. Pratt (she/her)

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From: Weber, Steven D. <steveweber@parkerpoe.com>

Sent: Thursday, February 10, 2022 2:57 PM

To: Pratt, Marirose <Pratt.Marirose@epa.gov>; Nowell, Valerie <Nowell.Valerie@epa.gov>

**Cc:** Cobery, Jim < JimC@TheKraftGroup.com>; Stephanie Blackman < sblackman@schwarzpartners.com> **Subject:** Status Update - New-Indy Catawba LLC's Response to EPA Section 114 Information Request

Marirose and Valerie:

Please find attached a status update regarding New-Indy Catawba LLC's response to EPA's Section 114 information request. New-Indy Catawba plans to begin a rolling production next week with the goal of completing production by February 28. Please let us know if you have questions. Thanks.

Steve	
Steve Weber	
Partner [	7

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